#### UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF MICHIGAN

**********	*****************
RICHARD L. BAIRD,	
D1 :	Case No.: 4:24-cv-11205-TGB-KGA
Plaintiff,	Judge: Terrance G. Berg
v	
DANA M. NESSEL, FADWA A.	Magistrate Judge: Kimberly G. Altman
HAMMOUD, and KYM L. WORTHY,	42 USC 1983
Defendants.	<i>I</i>
	t)

### **AFFIDAVIT OF JAMES HAVEMAN**

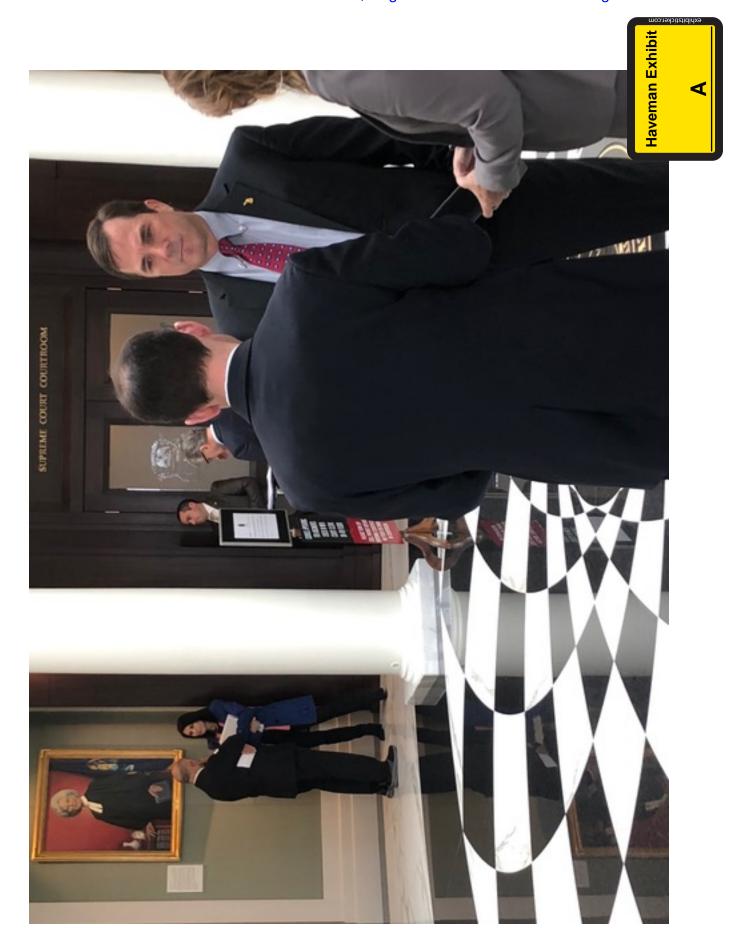
- I, James Haveman, being duly sworn deposes, and says as follows:
  - 1. I have personal knowledge of the matters I am testifying in this affidavit.
  - 2. I am competent to testify on the matters stated in this affidavit.
- 3. I have attached to this affidavit a photo of Ms. Dana Nessel, the Michigan Attorney General, that I took on May 4, 2022, during the oral arguments at the Michigan Supreme Court. The photograph depicts the actual scene and accurately reflects it when it occurred. (Exhibit A).
- 4. The photo was taken of her on one of the first days the Michigan Supreme Court heard oral arguments on <u>People of the State of Michigan v Nicholas Lyon</u>, Supreme Court No. 164191, Court of Appeals No. 360548, 7th Circuit Court Case No. 21-47378-FH.
- 5. Also, I witnessed her sitting in the back row of the courtroom during the oral arguments that day in the criminal case.
- 6. I sent FOIA requests focused partly on this issue, and Ms. Nessel didn't deny her involvement in the criminal case.
- 7. Attached as **Exhibit B** is a May 4, 2021 Acknowledgement by Ms. Christy Wendling-Richards, FOIA CoordinatorDepartment of Attorney General of my FOIA requests, including "Meeting times of AG Dana Nessel and Solicator [sic] General Fadwa Hammoud since January 1, 2019.

Baird Exhibit

- 8. Attached, as **Exhibit C** is a May 18, 2021, email from Ms. Wendling-Richards responding to my FOIA Request acknowledged above. Highlighted is an attachment entitled: "List of AG and SG meetings..."
- 9. The list of meetings between the Attorney General and Ms. Hammoud from January 1, 2019, to May 21, 2019, is attached as Exhibit D.

Further, the deponent saith not.

State of Michigan	
County of Kent	
The foregoing instrument was acknowledged before me 2024 by James Haveman.  Notary Public Signature:	on thisday of
Notary Printed Name: Cynthia L. Mass  Acting in the County of: Kent	NOTARY PUBLIC County of Kent
My Commission Expires: March 5, 2028	Acting in the County of Acting in the County of MICHIGAN



DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30754 Lansing, Michigan 48909

May 4, 2021

James K. Haveman 2656 Norway Maple Ct. SE Grand Rapids, MI 40512

Sent by email havemanjames@aol.com

Dear Mr. Haveman:

This notice supplements the Department of Attorney General's (Department) January 14, February 1, and April 6, 2021 notices issued in response to your January 8, 2021 request for information under the Freedom of Information Act (FOIA), MCL 15.231 *et seq*. (Copies of the FOIA request and the Department's notices are attached.)

You requested information described as follows:

- 1. Meeting times of AG Dana Nessel and Solicator [sic] General Fadwa Hammoud since January 1, 2019.
- 2. Names of AG Attorneys working on the Flint Water investigation
- 3. Names and invoices of any contract employees working on the Flint Water Investigation.
- 4. Copies of expenses vouchers of AG Attorneys working on the Flint Water Investigation.
- 5. Names and expense vouchers of any persons from other State Departments employees working on the Flint water Investigation.
- 6. Dates and e-mails (or letters) between AG Nessel and Attorney Todd Flood.
- 7. Dates of any meetings between AG Nessel and Governor Whitmer regarding the Flint water investigation.
- 8. Copy of the policy of AG Nessel per the "fire wall" between her Civil Investigation and AG Fadwa Hammoud's criminal investigation of the Flint water investigations.

In its February 1, 2021 notice, the Department stated that it would complete the processing of the request after receiving the deposit and would notify you in writing of the balance due, the statutory basis for exemptions, if any, and the statutory remedial rights, if applicable.

Haveman Exhibit

Page 2 May 4, 2021

The Department received your deposit in the amount of \$789.22 and your request is granted in part and denied in part.

As to the partial grant, upon receipt of the \$789.22 balance, by check payable to the State of Michigan and sent to the FOIA Coordinator, Department of Attorney General, P.O. Box 30754, Lansing, MI 48909, copies of the nonexempt records that are responsive to what you describe in item Nos. 1, 2, 3, 4, 7, and 8 will be provided.

Your request is partially denied for the following reasons:

Those parts of the records composed of personal information have been redacted under section 13(1)(a) of the FOIA, MCL 15.243(1)(a), which provides for the nondisclosure of, "[i]nformation of a personal nature if public disclosure of the information would constitute a clearly unwarranted invasion of an individual's privacy." In this particular instance, individuals' addresses, email addresses, and telephone numbers have been redacted.

In raising this exemption, the Department relies on *Mager v Dep't of State Police*, 460 Mich 134, 145-146 (1999), where the Supreme Court noted that, "[the core] purpose [of the FOIA] is not fostered by disclosure of information about private citizens that is accumulated in various governmental files but that reveals little or nothing about an agency's own conduct."

Those parts of the records composed of security measures have been redacted under section 13(1)(u) of the FOIA, MCL 15.243(1)(u), which provides for the nondisclosure of, "[r]ecords of a public body's security measures, including security plans, security codes and combinations, passwords, passes, keys, and security procedures, to the extent that the records relate to the ongoing security of the public body." In this particular instance employee identification numbers have been redacted.

Finally, after a search for records, to the best of the Department's knowledge, information, and belief, the Department does not possess records that are responsive to what you describe in item Nos. 5 and 6 or by other names reasonably known to the Department.

As to the partial denial of your request, under section 10 of the FOIA, MCL 15.240, the Department is obligated to inform you that you may do the following:

1) Appeal this decision in writing to the Attorney General, Department of Attorney General, 525 W. Ottawa, P.O. Box 30754, Lansing, MI 48909. The writing must specifically state the word "appeal" and must identify the reason or reasons you believe the partial denial should be reversed. The head of the Department or her designee must respond to your appeal within 10 business days after its receipt.

Page 3

May 4, 2021

Under unusual circumstances, the time for response to your appeal may be extended by 10 business days.

2) Commence an action in the Court of Claims within 180 days after the date of the final determination to partially deny the request. If you prevail in such an action, the court is to award reasonable attorney fees, costs, and disbursements, and possible damages.

The Department's FOIA Procedures and Guidelines can be accessed at <a href="https://www.michigan.gov/foia-ag">www.michigan.gov/foia-ag</a>.

Sincerely,

Christy Wendling-Richards

FOIA Coordinator

 $Department\ of\ Attorney\ General$ 

Christy Wendling - Richards

517-335-7573

Encs.



P.O. Box 30754 Lansing, Michigan 48909

April 6, 2021

James K. Haveman 2656 Norway Maple Ct. SE Grand Rapids, MI 40512 Sent by email havemanjames@aol.com

Dear Mr. Haveman:

This is a follow-up to the Department of Attorney General's (Department) January 14, and February 1, 2021 written notices, which were issued in response to your January 7, 2021 request for information under the Freedom of Information Act (FOIA), MCL 15.231 *et seq.* (Copies of the FOIA request and the Department's notices are attached).

The Department's February 1, 2021 notice estimated 30 business days to process the request after receipt of the good-faith deposit. The Department received the deposit on February 23, 2021.

The Department requires up to 20 more business days, through May 4, 2021, to complete the processing of the request, after which the Department will notify you in writing of the balance due, the statutory basis for exemptions, if any, and the statutory remedial rights, if applicable. After receipt of the fee balance, copies of the records will be provided.

The Department's FOIA Procedures and Guidelines can be accessed at www.michigan.gov/foia-ag.

Sincerely,

Christy Wendling-Richards

FOIA Coordinator

Department of Attorney General

Christy Wendling-Richards

517-335-7573

Encs.

DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30754 Lansing, Michigan 48909

February 1, 2021

James K. Haveman 2656 Norway Maple Ct., SE Grand Rapids, MI 40512 Sent by email havemanjames@aol.com

Dear Mr. Haveman:

This notice responds to your January 7, 2021 emailed letter (copy attached), received by the Department of Attorney General (Department) on January 8, 2021, requesting information, under the Freedom of Information Act (FOIA), MCL 15.231 *et seq*, that you describe in the letter.

A statutorily permitted extension of time to respond was taken through February 1, 2021.

Your request is granted as to any nonexempt records in the Department's possession that fall within the scope of your request.

Section 4(4) of the FOIA, MCL 15.234(4), provides that a public body must provide a detailed itemization that clearly lists and explains the allowable charges, where applicable, for the necessary copying of a public record for inspection; actual mailing costs; actual incremental cost of duplication or publication, including labor; and the cost of search, examination, review, and the separation and deletion of any exempt information from nonexempt information, which compose the total fee used for estimating and charging purposes.

The Department has determined that a voluminous number of records falls within the scope of your request. To limit the processing fee, the Department is charging at the hourly rate of the lowest paid staff persons capable of searching for and retrieving responsive records, reviewing and examining the records, and separating exempt and nonexempt material, if applicable.

If you would like to discuss whether the request can be refined to further lower the costs and shorten the processing period, please contact the undersigned in writing at this time.

Page 2 February 1, 2021

To commence the processing of the request, under section 4(8) of the FOIA, MCL 15.234(8), the Department requires a one-half good faith deposit of \$789.22 based on an estimated total cost of \$1,578.44. Failure to charge would result in an unreasonably high cost to the Department in this particular instance because employees must be taken away from pending work to process the large number of documents and expend additional time to complete regularly assigned Departmental work. Please refer to the attached Detailed Itemization Fee Form for a breakdown of the fees assessed.

As set forth under section 4(14) of the FOIA, MCL 15.234(14), if a fee appeal has not been filed under section 10a of the FOIA, MCL 15.240a, the Department must receive the required deposit within 45 days after your statutorily determined receipt of this notice, which is March 22, 2021; otherwise, the FOIA request will be considered abandoned and the Department will not be required to fulfill the request.

After receipt of the \$789.22 deposit check, made payable to the State of Michigan and sent to the FOIA Coordinator, Department of Attorney General, P.O. Box 30754, Lansing, MI 48909, the Department will complete the processing of the request within an estimated 30 business days. Section 4(8) of the FOIA, MCL 15.234(8), provides that the time frame estimate is nonbinding upon the public body, but the public body shall provide the estimate in good faith and strive to be reasonably accurate, and provide the public records in a manner based on this state's public policy set forth in section 1(2) of the FOIA, MCL 15.231(2), and the nature of the request in the particular instance.

The Department will notify you in writing of the balance due, the statutory basis for exemptions, if any, and the statutory remedial rights, if applicable. After receipt of the fee balance, copies of the records will be provided.

The Department's FOIA Procedures and Guidelines can be accessed at www.michigan.gov/foia-ag.

Sincerely,

Christy Wendling-Richards

FOIA Coordinator

Department of Attorney General

Christy Wendling-Richards

517-335-7573

Encs.

# Freedom of Information Act Detailed Itemization of Fees

Requester's name and address:	Dated:
Jim K. Haveman	2/1/21
2656 Norway Maple Ct. SE Grand Rapids, MI 49512	2/1/21
havemanjames@aol.com	
Fee calculation	Amount
1. Labor costs* to search for and retrieve responsive records:	
25.5 Hours x \$17.74 (hourly wage) + 50% of fringe benefits (multiplier for fringe benefits, not to exceed 50% or actual cost of fringe benefits).	\$665.29
2. Labor costs* for review and examination of responsive records and the separation of exempt from non-exempt material:	
35 Hours x \$17.74 (hourly wage) + 50% of fringe benefits (multiplier for fringe benefits, not to exceed 50% or actual cost of fringe benefits).	\$913.15
3. Nonpaper physical media: Describe (e.g. CD's, DVD's, flash drive, etc) and list actual costs.	\$
4. Duplication and publication: Describe (copying, scanning, etc)  \$ (cost per page) x number of pages.	\$
5. Labor costs* to duplicate or publish:	
Hours x \$ (hourly wage) x 50% (multiplier for fringe benefits, not to exceed 50% or actual cost of fringe benefits).	\$
6. Mailing: Describe and list actual costs.	\$
Less waiver for indigent individual or qualifying nonprofit organization. (\$20.00)**	1
Less reduction for untimely response:  \$ subtotal x 5% reduction per day x days.	\$
Make check payable to State of Michigan, and mail to: FOIA Coordinator, Department of Attorney General, P.O. Box 30754, Lansing, MI 48909.	
	Total fee: \$1,578.44
If the total fee is more than \$50.00, you will be asked to pay a deposit of one-half of the amount of the total fee. The total fee and deposit are estimates, and your final costs may vary from these amounts.	Deposit: \$789.22

## Freedom of Information Act Detailed Itemization of Fees

As set forth under section 4(14) of the FOIA, MCL 15.234(14), if a fee appeal has not been filed under section 10a of the FOIA, MCL 15.240a, the Department must receive the required deposit within 45 days after your statutorily determined receipt of this notice, which is March 22, 2021; otherwise, the FOIA request will be considered abandoned and the Department will not be required to fulfill the request.	
Part or all of the documents requested are available online at:	
If you prefer to have copies of these documents sent to you, please forward payment to the Department for processing.	\$

<sup>\*</sup>Labor costs will be calculated using the lowest paid Department employee capable of each task. If more than one hourly rate is used, they will be listed on other copies of this form.

<sup>\*\*</sup>You must submit an affidavit of indigency to qualify for this fee waiver.

## Wendling-Richards, Christy (AG)

From: havemanjames <havemanjames@aol.com>

Sent: Thursday, January 7, 2021 10:02 AM

To:AG-FOIASubject:FOIA requestAttachments:Doc1.docx

CAUTION: This is an External email. Please send suspicious emails to abuse@michigan.gov

FOIA Coordinator Michigan Department of Attorney General 525 Ottawa PO Box 30754 Lansing, Michigan 48909

VIA E- Mail: AG FOIA@Michigan.gov

January 7,2021

Dear FOIA Coordinator,

Pursuant to the Michigan Freedom of Information Act (MCL 15.231 et.seq) I am requesting the following information:

- 1. Meeting times of AG Dana Nessel and Solicator General Fadwa Hammoud since January 1,2019.
- 2. Names of AG Attorneys working on the Flint Water investigation
- 3. Names and invoices of any contract employees working on the Flint Water Investigation.
- 4. Copies of expenses vouchers of AG Attorneys working on the Flint Water Investigation.
- 5. Names and expense vouchers of any persons from other State Departments employees working on the Flint water Investigation.
- 6. Dates and e-mails (or letters) between AG Nessel and Attorney Todd Flood.
- 7. Dates of any meetings between AG Nessel and Governor Whitmer regarding the Flint water investigation.
- 8. Copy of the policy of AG Nessel per the "fire wall" between her Civil Investigation and AG Fadwa Hammoud's criminal investigation of the Flint water investigations.

Should the cost to fulfill this request exceed \$50.00, please contact me directly. Also please let me know via my e mail ( <a href="mailto:Havemanjames@aol.com">Havemanjames@aol.com</a>) that you received this FOIA request. Should you have any questions regarding this request, please feel free to contact me directly at the phone number of address.

Thank you, (signed)

James K. Haveman 2656 Norway Maple Ct SE Grand Rapids, Michigan 40512 1-517-881-0977 Havemanjames@aol.com DEPARTMENT OF ATTORNEY GENERAL



P.O. Box 30754 Lansing, Michigan 48909

January 14, 2021

James K. Haveman 2656 Norway Maple Ct. SE Grand Rapids, MI 40512 Sent by email havemanjames@aol.com

Dear Mr. Haveman:

This notice responds to your January 7, 2021 emailed letter (copy attached), received by the Department of Attorney General (Department) on January 8, 2021, requesting information under the Freedom of Information Act (FOIA), MCL 15.231 et seq.

To determine whether the Department possesses any information that might fall within the scope of the request, inquiry must be made of the Department's divisions. Therefore, it is necessary to extend the time for response, as permitted by section 5(2)(d) of the FOIA, MCL 15.235(2)(d), through February 1, 2021.

The Department's FOIA Procedures and Guidelines can be accessed at <a href="https://www.michigan.gov/foia-ag">www.michigan.gov/foia-ag</a>.

Sincerely,

Christy Wendling-Richards

FOIA Coordinator

Department of Attorney General

Christy Wendling-Richards

517-335-7573

Enc.

Begin forwarded message:

From: AG-FOIA < AG-FOIA@michigan.gov >

**Subject: Notice Regarding Your FOIA Request Email 1 of 2** 

Date: May 18, 2021 at 4:59:25 PM EDT

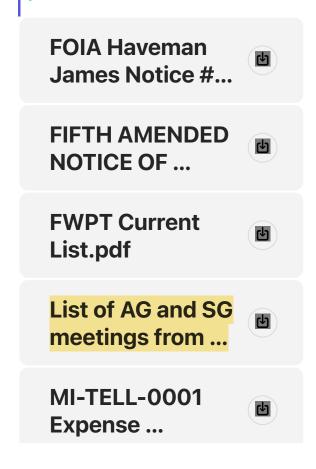
To: "havemanjames@aol.com" < havemanjames@aol.com >

Dear Mr. Haveman,

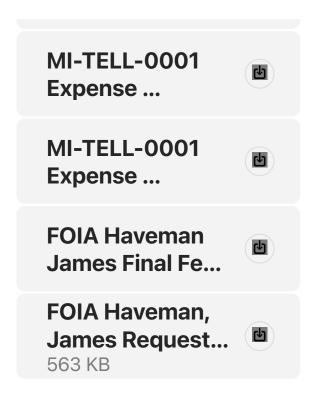
Please see the attached notice issued by the Department in response to your FOIA request, responsive records, a copy of the previous notices, and a copy of your original request.

Sincerely,

Christy Wendling-Richards FOIA Coordinator Michigan Department of Attorney General (517) 335-7573







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Appointment Date	Start
1/18/19	Fri 1/18/2019 9:30 AM
1/22/19	Tue 1/22/2019 11:00 AM
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1/25/19	Fri 1/25/2019 9:30 AM
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2/13/19	Wed 2/13/2019 10:30 AM
2/20/19	Wed 2/20/2019 10:30 AM
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3/14/19	Thu 3/14/2019 1:00 PM
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